



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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February 21, 2020

Delivered electronically to Helen Wheatley at [h.wheatley100@gmail.com](mailto:h.wheatley100@gmail.com)

Subject: Complaint regarding Dean Nielsen and People for Thurston County Jobs, PDC Case 61735

Dear Ms. Wheatley:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 21, 2019. Your complaint alleged that People for Thurston County Jobs and Dean Nielsen, may have violated RCW 42.17A.205 by failing to completely and accurately disclose officers of the committee, as defined under RCW 42.17A.205 and WAC 390-05-245.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by People for Thurston County Jobs and Dean Nielsen (Committee); and reviewed their data in the PDC database, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On October 11, 2019, the Committee filed a Committee Registration (C-1pc) selecting the Full Reporting option and listing Jason Bennett and Dean Nielsen as Committee officers.
- The complaint, which was filed on December 21, 2019, alleged that the Committee failed to completely and accurately disclose officers of the committee, as defined under RCW 42.17A.205.
- RCW 42.17A.205(c)(j) states, (c) "The Statement of organization shall include but not be limited to: The names, addresses, and titles of its officers; or if it has no officers, the names, addresses, and titles of its responsible leaders; and (j) The name, address, and title of any person who authorizes expenditures or makes decisions on behalf of the candidate or committee."
- WAC 390-05-245 broadly defines a committee officer as, "Any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other Persons, makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee."
- On October 21, 2019, the Committee amended its Committee Registration to include "Sponsored by Weyerhaeuser Company" in the name of the Committee to depict Weyerhaeuser Company as the sponsor of the Committee. Four days later, on October 25, 2019, the Committee amended its Committee Registration

for the second time to remove “Sponsored by Weyerhaeuser Company” since its contribution fell below the 80% threshold.

- The Committee listed Dean Nielsen and Jason Bennett as Committee officers on the initial Committee Registration that was filed on October 11, 2019, and on the two subsequent Committee Registrations that were amended to reflect the inclusion and removal of “Weyerhaeuser Company” as sponsor of the Committee on October 21, 2019 and October 25, 2019, respectively. All three Committee Registrations were filed with the PDC prior to this complaint being filed.
- In its response to this allegation, the Committee and Dean Nielsen, by way of Jason Bennett stated, “Officers might include a person who directs the creation of the PAC and/or hire on treasurer staff could also be broadly-defined as a strategic decision maker on behalf of the committee. That person in both instances is Dean Nielsen, who is listed on our C-1PC. No other person meets the definitions above nor fits the additional clarity the PDC staff have provided.”
- Except for Dean Nielsen and Jason Bennett, staff found no other unnamed individuals affiliated with the Committee who meet the statutory/rule definition of a committee officer that were not included on the committee registration.

Based on these findings, staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

Endorsed by,

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
BG Sandahl, Deputy Director  
Peter Lavalley, Executive Director

cc: Dean Nielsen  
Jason Bennett